

AIR

POLLUTION

CONTROL

AGENCY

KING COUNTY

KITSAP COUNTY

PIERCE COUNTY

SNOHOMISH COUNTY

January 15, 1997

Cert. Mail No. P 371 603 785

Ash Grove Cement Co. Mr. Henrik Voldbaek, Manager 3801 E. Marginal Way S. Seattle, WA 98134 RECEIVED

JAN 1 7 1997 AGCW-SEATTLE

Dear Mr. Voldbaek:

<u>Disposition of Notices of Violation No. 36944, 36945, 36946, and 36947</u>

<u>Compliance Status Reports, dated January 10, 1997</u>

<u>Registration No. 11339</u>

Based on the information you provided us in your October 1996 CEM report, this Agency considers Notice of Violation No. 36945 closed. We will take no further enforcement action on this case.

Please also find enclosed Notices of Violation No. 36944, 36946, and 36947 as well as two Compliance Status Reports. These matters remain open.

If you have any questions concerning this matter, please contagt me at 689-4078.

Sincere

N¢al J. Shulmah

Manager - Inspection

MM:dcr Enclosure

cc: Elizabeth M. Gilpin, Air Pollution Inspector

Rosemary G. Busterna, Senior Air Pollution Inspector

Melissa McAfee, Air Pollution Inspector Fred L. Austin, Air Pollution Engineer

BOARDOF

Dennis J. McLerran, Air Pollution Control Officer

AGCS2M000955

Commissioner, Kitsap County Member at Large Mayor, Everett Mayor, Bremerton Snohomish County Council King County Executive Mayor, Tacoma Mayor, Seattle Pierce County Executive

DIRECTORS

PUGET SOUND AIR POLLUTION CONTROL AGENCY

110 Union Street, Suite 500, Seattle, Washington 98101-2038

Responsible Person, Title Henrik Voldback Manager Location of Violation (Address) 380 E. Marginal Why 50. Seattle 98/34 king Mailing Address City State Zip Phone Seattle Wh. 98/34 King Phone DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF: REGULATION OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR: Pailure to obvain Notice of Construction approval prior to construction/installation/establishment of a source. Visible emissions in excess of 20% opacity for priords aggregating more than 3 minutes/hour. Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property section 9.15(a) Emission of fugitive dust without use of best available control technology. Section 9.15(a) Emission of fugitive dust without use of best available control technology. Section 9.16(b) Section 9.16(c) Section 9.16(c) Failure to opperate and maintain equipment in growess equipment or control apparatus. Failure to opperate and maintain equipment in good working proder. Failure to meet Order of Approval No. 5730 Condition No. 6 Section Emission of operate and maintain equipment in good working order. Failure to meet Order of Approval No. 5730 Condition No. 6 Section Emission of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliances with the gulations, and test the following necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliances with the gulations, and test the following necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliances with the gulations, and test the following necessary corrective action.	Date of Violation: October 5th	, 19_	16	atm.
Location of Violation (Address) 380 E. Marginal Way 50. Seattle 98134 King Mailing Address City State Zip Phone City, State Zip Phone DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF: REGULATION OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR: Section 5.05(e) Failure to develop and implement an operation and maintenance plan. Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source. Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour. Section 9.11(a) Emission of air contaminants without use of best available control technology. Section 9.15(a) Emission of fugitive dust without use of best available control technology. Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway. Section 9.16(b) Section 9.16(c) Emission of fugitive dust without use of best available control technology. Section 9.16(b) Section 9.16(c) Emission of fugitive dust without use of best available control technology. Section 9.16(b) The section 9.16(c) Emission of fugitive dust from manufacturing process equipment or control apparatus. Section 9.16(c) Failure to apply VOC-containing material using sprny equipment in an enclosed area with filtered exhaust and vertical stack. Failure to apply VOC-containing material using sprny equipment in an enclosed area with filtered exhaust and vertical stack. Failure to meet Order of Approval No. 5730. Condition No. 6 Section Emission of the following order. Failure to meet Order of Approval No. 5730. Condition No. 6 Section Emission of the following order. CORRECTIVE ACTION ORDER Indee the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of his Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the	Name	Responsible Person, Titl	e	
As Above DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF: Section 5.05(e) Section 5.05(e) Section 5.03(a) Section 9.03(a) Section 9.03(a) Section 9.13(b) Section 9.13(c) Section 9.15(c) Se	Ash Grove Cement Co.	Henrik V	loldback	Manager
Mailing Address City, State Sea # C WA. 9834 762 - 0660 DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF: REGULATION OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR: Section 5.05(c) Failure to develop and implement an operation and maintenance plan. Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour. Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property of the property of the p	Location of Violation (Address)	City	Zip	County
DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF: REGULATIONOF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR: Section 5.05(e)	3801 E. Marginal Way So.	Seattle		
DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF: REGULATION OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR: Section 5.05(e) Section 6.03(a) Failure to develop and implement an operation and maintenance plan. Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source. Visible emission in excess of 20% opacity for periods aggregating more than 3 minutes/hour. Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property (section 9.15(a)) Emission of fugitive dust without use of best available control technology. Section 9.15(a) Emission of fugitive dust without use of best available control technology. Section 9.15(a) Emission of fugitive dust without use of best available control technology. Section 9.15(b) Emission of fugitive dust without use of best available control technology. Section 9.15(a) Emission of fugitive dust without use of best available control technology. Section 9.15(b) Emission of fugitive dust from manufacturing process equipment or control apparatus. Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack. Section 9.20 Failure to operate and maintain equipment in good working order. Failure to operate and maintain equipment in good working order. Failure to meet Order of Approval No. 5730 Condition No. 6 Section	Mailing Address	City, State	Zip	Phone /
Section 5.05(e) Section 6.03(a) Section 9.03(a) Section 9.12(b) Section 9.15(b) Section 9.15(a) Section 9.15(a) Section 9.15(a) Section 9.15(b) Section 9.15(c) Section 9.15(c) Section 9.15(c) Section 9.15(c) Section 9.16	As Above	Seattle WA.	98134	762-0660
CORRECTIVE ACTION ORDER Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the	Section 9.15(c) Emission of fugitive dust from manufacturing p Section 9.16 Failure to apply VOC-containing material using Section 9.20 Failure to operate and maintain equipment in go Failure to meet Order of Approval No. 5736 Section Emissions from the main bank String of PSD limits of the following	rocess equipment or control app g spray equipment in an enclosed bod working order. Condition No. 6	paratus. I area with filtered	
Inder the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of a Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the	ACTS ALLEGED TO CONSTITUTE A VIOLATION	ictober CEM	Report	
guiations, and take the following necessary corrective action.	1 I and PCW 70 94 211	you are ordered to submit a w	ritten report with	in ten (10) days of receipt of ontinuous compliance with the

Signing this Notice is not an admission of guilt



AIR

POLLUTION

CONTROL

AGENCY

KING COUNTY

KITSAP COUNTY

PIERCE COUNTY

SNOHOMISH COUNTY

September 23, 1996

Ash Grove Cement Co. c/o Henrik Voldback 3801 E Marginal Way S Seattle, WA 98134

Dear Mr. Voldbaek:

Ash Grove Cement Co.

<u>Disposition of Notice of Violation No. 36931</u>

Based on the information you provided to us in your July 1996 CEM report dated September 5, 1996, this Agency considers the above-referenced matter closed. We will take no further enforcement action on this case.

If you have any questions concerning this matter, please contact me at 689-4078.

Neal J. Shulman

Manager - Inspection

NJS:kes

cc: Elizabeth Gilpin, Inspector

Rosemary Busterna, Lead Inspector

Melissa McAfee, Inspector

Fred Austin, Engineer

RECEIVED

SEP 2 4 1996

F.JUW-SEATTLE

Dennis J. McLerran, Air Pollution Control Officer

BOARD OF DIRECTORS

Chairman: Win Granlund, Commissioner, Kitsap County Janet Chalupnik, Member at Large Edward D. Hansen, Mayor, Everett Lynn S. Horton, Mayor, Bremerton R.C. Johnson, Councilman, Snohomish County Gary Locke, King County Executive Brian Ebersole, Mayor, Tacoma Norman B. Rice, Mayor, Seattle Doug Sutherland, Pierce County Executive

110 Union Street, Suite 500, Seattle, Washington 98101-2038 206-343-8800 / 1-800-552-3565 / Fax 206-343-7522 36931 Registration No. 1133 No. NOTICE OF VIOLATION Date of Violation: Responsible Person, Title Name Henrik Voldback Manager Ash Grove Cement Co. County City Location of Violation (Address) 3801 E. Marginal Way So. Scattle 98134 Phone City, State **Mailing Address** (206) 623- 5596 Seattle, WA. 98134 95 above DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF: OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR: REGULATION Failure to develop and implement an operation and maintenance plan. Section 5.05(e) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source. Section 6.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour. Section 9.03(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property. Section 9.11(a) Emission of odor-bearing air contaminants without use of best available control technology. Section 9.12(b) Emission of fugitive dust without use of best available control technology. Section 9.15(a) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway. Section 9.15(b) Emission of fugitive dust from manufacturing process equipment or control apparatus. Section 9.15(c) Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack. Section 9.16 Failure to operate and maintain equipment in good working order. Section 9.20 Failure to meet Order of Approval No.____ Fmission of air contaminant by a CEMS not to exceed Section FACTS ALLEGED TO CONSTITUTE A VIOLATION _______ CEM CORRECTIVE ACTION ORDER Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to <u>submit a written report within ten (10) days of receipt of this Notice</u> describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, <u>and</u> take the following necessary corrective action:

ssued By:

Air Pollution Inspector

9/23/96

Received By: _______Signing this Notice is not an admission of guilt

Form No. 70-119 (Rewised 12/95 cbc)



AIR

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PIERCE COUNTY

SNOHOMISH COUNTY

September 10, 1996

Henrik Voldbaek Ash Grove Cement Co. 3801 E Marginal Way Seattle, WA 98134

RECEIVED

SEP 1 3 1996

AGCW-SEATTLE

Dear Mr. Voldbaek:

Disposition of Notice of Violation No. 36924, 36925, 36926, and 36927 PSAPCA Reg. No. 11339

Based on the information you provided to us in your June 1996 CEM Report and corrective action letter dated July 30, 1996, this Agency considers the above-referenced matter closed and will take no further enforcement action in this case.

loscel

Please also find enclosed Notice of Violation No. 36923 which also stems from your June 1996 CEM Report and remains open.

If you have any questions concerning this matter, please contact me at 689-4078.

Neal J. Shulman

Manager - Inspection

cc:

Rosemary G. Busterna, PSAPCA Elizabeth M. Gilpin, PSAPCA Melissa McAfee, PSAPCA Fred L. Austin, PSAPCA

EMG\cbc

Dennis J. McLerran, Air Pollution Control Officer

BOARD OF DIRECTORS

Chairman: Win Granlund, Commissioner, Kitsap County Janet Chalupnik, Member at Large Edward D. Hansen, Mayor, Everett Lynn S. Horton, Mayor, Bremerton R.C. Johnson, Councilman, Snohomish County Gary Locke, King County Executive Brian Ebersole, Mayor, Tacoma Norman B. Rice, Mayor, Seattle Doug Sutherland, Pierce County Executive Registration No. 11339 Cert. Mail No. 9 588 633 576

Form No. 70-119 (Revised 12/95 cbc)

110 Union Street, Suite 500, Seattle, Washington 98101-2038 206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

No. 36924

AGCS2M000960

NOTICE OF VIOLATION

Date of Violation: 6-2		96	atm.
Name	Responsible Person, Titl	е	
Ash Grove Coment Co.	Henrik L	lold baek	t, Mor
Location of Violation (Address)	City	Zip	County
3801 E. Marginal Way	Seattle	98134	KING
Mailing Address	City, State	Zip	Phone
Same	, WA		623-5596
DID UNLAWFULLY CAUSE	OR ALLOW VIO	LATION OF:	
REGULATION OF THE PUGET SO	OUND AIR POLLUTION	CONTROL AG	ENCY FOR:
Section 5.05(e) Section 6.03(a) Section 9.03(a) Section 9.11(a) Section 9.12(b) Section 9.15(a) Section 9.15(c) Section 9.15(c) Section 9.16 Section 9.20 Failure to develop and implement an operation and the provided provided providing approval provided providing approval providing approval providing approval provided providing approval providing approviding approval providing approval providing approval providing	ior to construction/installations aggregating more than 3 stics/duration so as to be injuse of best available control ble control technology. ad onto a paved public road as equipment or control appay equipment in an enclosed working order. , Condition No	minutes/hour. urious or interfere witechnology. way. aratus.	ith enjoyment of life/property.
	OI ACM	2 - 1	
FACTS ALLEGED TO CONSTITUTE A VIOLATION	96 CEM &	eport	
		11	
CORRECTIVE A Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you this Notice describing the necessary corrective action you have taken or proporegulations, and take the following necessary corrective action: Add Add Chief	are ordered to submit a wr	itten report within	ten (10) days of receipt of inuous compliance with the
ssued By: MM Cafe 9/12/96	Received By:	§ 20	D # 2: =
Air Pollution Inspector Date/Time	•	Signing this Notice is	not an admission of guilt

KS

Registration No. 11339

Cert. Mail No. P 588 633 576

Air Pollution Inspector

Form No. 70-119 (Revised 12/95 cbc)

110 Union Street, Suite 500, Seattle, Washington 98101-2038 206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

No.

36925

AGCS2M000961

NOTICE OF VIOLATION

Date of Violation:		96	atm.
Name	Responsible Person, Titl	e	
Ash Grove Cement Co.	Henrik 1	Iold bae	et, Mg
Location of Violation (Address)	City	Zip	County
3801 E. Marginal Many	Seattle	98134	KING
Mailing Address	City, State	Zip	Phone
Same	, wA		623-5596
DID UNLAWFULLY CAUSE REGULATION OF THE PUGET	OR ALLOW VIO		ENCY FOR:
□ Section 5.05(e) □ Section 6.03(a) □ Section 9.03(a) □ Section 9.11(a) □ Section 9.12(b) □ Section 9.15(a) □ Section 9.15(c) □ Section 9.15(c) □ Section 9.16 □ Section 9.17 □ Section 9.18 □ Section 9.19 □ Section 9.19 □ Section 9.19 □ Section 9.19 □ Section 9.15(c) □ Sec	prior to construction/installat riods aggregating more than 3 ristics/duration so as to be inj t use of best available control able control technology. load onto a paved public road cess equipment or control app oray equipment in an enclosed I working order. Condition No.	minutes/hour. urious or interfere w technology. lway. paratus. I area with filtered ex	ith enjoyment of life/property.
□ Section			3 2
FACTS ALLEGED TO CONSTITUTE A VIOLATION	196 CEM	report	
CORRECTIVE Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 y this Notice describing the necessary corrective action you have taken or pro regulations, and take the following necessary corrective action:	ACTION ORDE ou are ordered to submit a wi pose to take, including a sche	ritten report within	ten (10) days of receipt of tinuous compliance with the
Issued By: Air Pollution Inspector Date/Time	Accounted by.	Signing this Notice is	s not an admission of guilt

Registration No. 11339 Cert. Mail No. P 588 633 576 Date of Violation: 110 Union Street, Suite 500, 206-343-8800 / 1-800-55 NOTICE OF	Seattle, Washington 981 2-3565 / Fax 206-343	01-2038 -7522	ъ. 36926
Date of Violation:	, 19	10	atm.
Name	Responsible Person, Title	е	
Ash Grove Cement Co.	Henrik 1	Voldbae	k, Mg
Location of Violation (Address)	City	Zip	County
3801 E. Marginal Way	Seattle	98134	KING-
Mailing Address	City, State	Zip	Phone
Same	JWA	X =	623-5996
DID UNLAWFULLY CAUSE	OR ALLOW VIOL	LATION OF:	
	OUND AIR POLLUTION		ENCY FOR:
□ Section 5.05(e) □ Section 6.03(a) □ Section 9.03(a) □ Section 9.11(a) □ Section 9.12(b) □ Section 9.15(a) □ Section 9.15(b) □ Section 9.15(c) □ Section 9.16 □ Section 9.17 □ Section 9.15(c) □ Sec	ior to construction/installations aggregating more than 3 stics/duration so as to be injuse of best available control ble control technology. ad onto a paved public road ass equipment or control appay equipment in an enclosed working order.	minutes/hour. urious or interfere wi technology. way. aratus.	ith enjoyment of life/property.
□ Section			
FACTS ALLEGED TO CONSTITUTE A VIOLATION CORRECTIVE A Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you this Notice describing the necessary corrective action you have taken or propor	are ordered to submit a wi	itten report within	ten (10) days of receipt of inuous compliance with the
regulations, and take the following necessary corrective action:	V		

Form No. 70-119 (Revised 12/95 cbc)

Date/Time

Received By:

Signing this Notice is not an admission of guilt
AGCS2M000962

	,
Registration No	11339
TrePiper error : .or	(mm) (30 mm)
Cont Mad No	P588 633.576

110 Union Street, Suite 500, Seattle, Washington 98101-2038 206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

NOTICE OF VIOLATION

No. 36927

Signing this Notice is not an admission of guilt

AGCS2M000963

Cert. Mail No. P588 633576 NOTICE OF	* VIOLATIC	JN	
Date of Violation: 6-18		96	atm.
Name	Responsible Person, Title	e	
Ash Grove Cement Co.	Henrik	Voldbe	iek, Mgr
Location of Violation (Address)	City	Zip	County
3801 E. Marginal Way	Seattle	98134	KING
Mailing Address	City, State	Zip	Phone
Same	, wA		623-5596
DID UNLAWFULLY CAUSE	OR ALLOW VIO	LATION OF:	
REGULATION OF THE PUGET S	OUND AIR POLLUTION	N CONTROL AG	ENCY FOR:
Section 5.05(e) Section 6.03(a) Section 9.03(a) Section 9.11(a) Section 9.12(b) Section 9.15(a) Section 9.15(c) Section 9.15(c) Section 9.16 Section 9.10 Section 9.15(c) Section 9.15(c)	tior to construction/installations aggregating more than 3 stics/duration so as to be injuse of best available control ble control technology. and onto a paved public road ass equipment or control appay equipment in an enclosed working order.	minutes/hour. urious or interfere wi technology. way. aratus. l area with filtered ex	ith enjoyment of life/property
FACTS ALLEGED TO CONSTITUTE A VIOLATION	196 CEN	repor	+
CORRECTIVE A Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you this Notice describing the necessary corrective action you have taken or propor regulations, and take the following necessary corrective action:	are ordered to submit a wr	itten report within	ten (10) days of receipt of inuous compliance with the
ssued By:	Received By:		

Date/Time

KS 9/12/96

Air Pollution Inspector

Form No. 70-119 (Revised 12/95 cbc)



AIR

POLLUTION

CONTROL

AGENCY

SNOHOMISH COUNTY

KING COUNTY

KITSAP COUNTY

April 17, 1996

Henrik Voldbaek Ash Grove Cement Co. 3801 E Marginal Way S Seattle, WA 98134

Dear Mr. Voldbaek:

Disposition of Notice of Violation No. 36923

Based on the information provided in your June 1996 CEM Report, this Agency considers the above-referenced incident an excused violation and will take no further enforcement action in this case.

If you have any questions concerning this matter, please contact me at 689-4078.

Sincerely

Neal J. Shulman

Manager - Inspection

cc:

Elizabeth Gilpin, PSAPCA

Melissa McAfce, PSAPCA

Rosemary G. Busterna, PSAPCA

Fred L. Austin, PSAPCA

EMG\cbc

AGCS2M000964

Dennis J. McLerran, Air Pollution Control Officer

110 Union Street, Suite 500, Seattle, Washington 98101-2038

Registration No.

Air Pollution Inspector

Form No. 70-119 (Revised 12/95 cbc)

206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

No. 36923

NOTICE OF VIOLATION

Date of Violation:	22		96	atm.
Name		Responsible Person, Titl	e	
Ash Grove Ceme	at Co.	Henrik V	'oldbaek	, Manager
Location of Violation (Address)		City	Zip	County
3801 E. Margin	al Wy	Seattle	98134	KING
Mailing Address		City, State	Zip	Phone
		2.5	2	=
Same	7	, wA		623-5596
DID U	INLAWFULLY CAUSE (OR ALLOW VIOLUTION		ENCY FOR:
	elop and implement an operation and r			
	in Notice of Construction approval pr		on/establishment of	a source.
	ons in excess of 20% opacity for period			
	r contaminant in quantities/characteris			ith enjoyment of life/property.
	lor-bearing air contaminants without u			
☐ Section 9.15(a) Emission of fu	gitive dust without use of best availab	ole control technology.	4 0	
	mud, dirt, or debris from vehicle or lo			
	gitive dust from manufacturing proce			
☐ Section 9.16 Failure to apply	y VOC-containing material using spra	ay equipment in an enclosed	area with filtered ex	khaust and vertical stack.
Section 9.20 Failure to oper	ate and maintain equipment in good v	vorking order.	Emissions	>10490pm,8-1
Failure to meet	tate and maintain equipment in good vet Order of Approval No. 5730	_, Condition No		
Section	warrage for CO			
□ Section				
FACTS ALLEGED TO CONSTIT	UTE A VIOLATION6/9	6 CEM rep	aort	
Under the provisions of Section 3.09 of I this Notice describing the necessary corregulations, and take the following necessary	ective action you have taken or propo	are ordered to submit a wr	itten report within	ten (10) days of receipt of inuous compliance with the
	,			
mil My	h	<i>a.</i>		

Received By: _

Date/Time

Signing this Notice is not an admission of guilt



"WESTERN REGION"

September 23, 1996

Neal J. Shulman Puget Sound Air Pollution Control Agency 110 Union Street, Suite 500 Seattle WA 98101-2038

Dear Mr. Shulman:

Re: Notice of Violation 36923

The following is in response to your letter dated September 10, 1996 and received September 13, 1996.

NOV # 36923:

The eight hour average for CO emissions was 1151 ppmc for the period between 16:00 and 24:00 on 6/22/96. This was caused by inconsistent feeding of whole tires being used as fuel to the calciner.

We are have already implemented and are continuing to implement changes to the process to solve the problems of erratic tire flow and the spikes to the CO emissions it causes. A fifteen minute average of the CO has been added, in addition to an instantaneous reading, to the operator screens. This gives the operators a more realistic view of the continuous CO values than the instantaneous values. An alarm has been set up on the fifteen minute average at 90% of the 1000 ppmc limit on the 8 hour average. Mechanical changes have been made from designing better ways for the tires to enter the feed chute to better access to clear plugs in the feed chute. We are continuing to make these changes as problems become apparent.

Sincerely,

J. Trygve Grey

Assistant Plant Superintendent



AIR

POLLUTION

CONTROL

AGENCY

KING COUNTY

KITSAP COUNTY

PIERCE COUNTY

SNOHOMISH COUNTY

September 10, 1996

Henrik Voldbaek Ash Grove Cement Co. 3801 E Marginal Way Seattle, WA 98134

PECEIVED

SEP 1 3 1996 AGCW-SEATTLE

Dear Mr. Voldbaek:

Disposition of Notice of Violation No. 36922 PSAPCA Reg. No. 11339

Based on the information you provided to us in your May CEM Report and corrective action letter dated June 28, 1996, this Agency concurs that the May 26th excursions of the Reg. I 9.09(b)(1) and Reg. I 9.09(b)(2) standards meet the WAC criteria for upset. The Agency considers the above-referenced matter closed and will take no further enforcement action in this case.

Please also find enclosed Notices of Violation No. 36912, 36913, 36914, 36915, 36916, 36917, 36918, 36919, 36920, and 36921. These violations also stem from your May 1996 CEM Report and remain open.

If you have any questions concerning this matter, please contact me at 689-4078.

Neal J. Shulman

Manager - Inspection

cc:

Rosemary G. Busterna, PSAPCA Elizabeth M. Gilpin, PSAPCA Melissa McAfee, PSAPCA Fred L. Austin, PSAPCA

Dennis J. McLerran, Air Pollution Control Officer

EMG\cbc

BOARD OF DIRECTORS

Chairman: Win Granlund, Commissioner, Kitsap County Janet Chalupnik, Member at Large Edward D. Hansen, Mayor, Everett Lynn S. Horton, Mayor, Bremerton R.C. Johnson, Councilman, Snohomish County Gary Locke, King County Executive Brian Ebersole, Mayor, Tacoma Norman B. Rice, Mayor, Seattle Doug Sutherland, Pierce County Executive 110 Union Street, Suite 500, Seattle, Washington 98101-2038 206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No. 11339

Cert. Mail No. P 588 633 576

NOTICE OF VIOLATION

186. 36922

Cert. Mail No. 1688 633 576 NOTICE OF	VIOLATIC	JN	
Date of Violation: May 26		96	atm.
Name	Responsible Person, Titl	e	
Ash Grove Cement Co.	Henrik V	'oldbaek	Manager
Location of Violation (Address)	City	Zip	County
3801 E Marginal Way So.	Seattle	98134	King
Mailing Address	City, State	Zip	Phone
As Above	Scattle, WA.	98134	623-5596
Section 5.05(e) Section 6.03(a) Section 9.03(a) Section 9.11(a) Section 9.12(b) Section 9.15(a) Section 9.15(b) Section 9.15(c) Section 9.16 Section	ior to construction/installations aggregating more than 3 stics/duration so as to be injuse of best available control ole control technology. ad onto a paved public roads sequipment or control appay equipment in an enclosed working order. Condition No. 2020 opacity for a control of the control of the condition of the control of the control of the control of the condition of the control of the condition of the	ion/establishment of minutes/hour. urious or interfere w technology. way. aratus. I area with filtered experience of the second	a source. with enjoyment of life/property xhaust and vertical stack. Ave as any 2 ar as ten (10) days of receipt of

Form No. 70-119 (Regised 12/95 cbc)

9/12/96 Date/Time

KS

Received By: _______ Signing this Notice is not an admission of guilt



PUGET SC

SOUND

AIR

POLLUTION

CONTROL

AGENCY

KING COUNTY

KITSAP COUNTY

PIERCE COUNTY

SNOHOMISH COUNTY

October 31, 1996

RECEIVED

Henrik Voldbaek Ash Grove Cement Co. 3801 E Marginal Way S Seattle, WA 98134 NOV 0 1 1996 AGCW-SEALTLE

Dear Mr. Voldbaek:

Notices of Violation No. 36914 - 36920

We have evaluated your corrective action response dated September 23, 1996, regarding Notices of Violation No. 36914 - 36920. Since the levels reported occurred during start-up and were under the limits specified in Notice of Construction No. 5730 Condition No. 7, these Notices of Violation are hereby rescinded.

Notices of Violation No. 36912, 36913, and 36921 remain open.

Thank you for your cooperation. If you have any questions, please feel free to contact me at 689-4078.

Sincerei

Neal J. Shulmah

Manager - Inspection

cc:

Rosemary Busterna, PSAPCA Elizabeth Gilpin, PSAPCA

Melissa McAfee, PSAPCA

Fred Austin, PSAPCA

EMG/cbc

Dennis J. McLerran, Air Pollution Control Officer

BOARD OF DIRECTORS

Pagistration No. 11339		Seattle, Washington 981 52-3565 / Fax 206-343	7500 -	No. 36914
Cert. Mail No. P 588 632	E OI	F VIOLATIO	N	
- il w/wo		. 19		atm.
Nan Ricindell		Responsible Person, Titl	e	
Nan Recincled w/wo A. Retion		Henrik Vol	dback	Manager
Location		City	Zip	County
3801		Seattle	98134	king
Mailing Ad		City, State	Zip	Phone
A5		Scattle, WA.	98134	(206) 623-5596
DID UNLAWFUL	LY CAUSE	OR ALLOW VIO	LATION OF:	
		OUND AIR POLLUTION	N CONTROL AG	SENCY FOR:
Section 5.05(e) Section 6.03(a) Failure to develop and implement Failure to obtain Notice of Consts Visible emissions in excess of 20 Section 9.11(a) Section 9.12(b) Section 9.15(a) Section 9.15(b) Section 9.15(c) Section 9.15(c) Section 9.16 Section 9.16 Section 9.20 Failure to apply VOC-containing Failure to operate and maintain expands for the first process of the section of Approvation of	ruction approval prior opacity for perior unantities/characteristaminants without at use of best availables from vehicle or location proces material using spragginment in good and approved to the control of the control opacity of the control opacity opac	rior to construction/installations aggregating more than 3 stics/duration so as to be injuse of best available control ble control technology. and onto a paved public road assequipment or control appay equipment in an enclosed working order.	minutes/hour. urious or interfere w technology. way. aratus. I area with filtered e	with enjoyment of life/property.
□ Section				
FACTS ALLEGED TO CONSTITUTE A VIOLA	TION MAY	1996 CEM	Report	
CORR Under the provisions of Section 3.09 of Regulation I and Re this Notice describing the necessary corrective action you be regulations, and take the following necessary corrective act	CW 70.94.211 you have taken or propo	ACTION ORDE are ordered to submit a wr ose to take, including a sched	itten report within	n ten (10) days of receipt of tinuous compliance with the
1 1 1 1	,			
They La fight	210101		1 1 212 1 1 1 1 1 1 1 1	
Air Pollution Inspector Form No. 70-119 (Revised 12/95 cbc)	9 2 96 Date/Time	Received By:	Signing this Notice i	is not an admission of guilt AGCS2M000970

KS

Registration No. 11339
Cert. Mail No. 9 588 633 576

110 Union Street, Suite 500, Seattle, Washington 98101-2038 206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

No. **36915** <

NOTICE OF VIOLATION

Date of Violation:		96	atm.
Name	Responsible Person, Tit	le	
Ash Grove Cement Co.	Henrik Ve	oldback	Manager
Location of Violation (Address)	City	Zip	County
3801 E. Marginal Way So.	Scattle	98134	King
Mailing Address	City, State	Zip	Phone
As Above	Seattle, WA	98134	(206) 623-559
DID UNLAWFULLY CAUSE	OR ALLOW VIO	LATION OF	: =
Section 5.05(e) Failure to develop and implement an operation an Section 6.03(a) Failure to obtain Notice of Construction approval Visible emissions in excess of 20% opacity for per Section 9.11(a) Section 9.12(b) Section 9.15(a) Section 9.15(a) Section 9.15(b) Section 9.15(c) Section 9.15(c) Section 9.15(c) Section 9.16 Section 9.17 Section 9.18 Section 9.19 Section 9.19 Section 9.15(c) Section 9.16 Section 9.16 Section 9.16 Section 9.16 Section 9.17 Section 9.17 Section 9.17 Section 9.18 Section 9.18 Section 9.19 Section 9.19 Section 9.15(c) Sect	prior to construction/installar riods aggregating more than ristics/duration so as to be in at use of best available control lable control technology. load onto a paved public roa cess equipment or control appray equipment in an enclosed working order. , Condition No	3 minutes/hour. jurious or interfere I technology. dway. paratus. d area with filtered	with enjoyment of life/property
Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 y this Notice describing the necessary corrective action you have taken or pro regulations, and take the following necessary corrective action: (Section 3.09 of Regulation I and RCW 70.94.211 y this Notice describing the necessary corrective action: Provision Provi	pose to take, including a sche	ritten report with edule, to achieve co	ontinuous compliance with the
Air Pollution Inspector Date/Time Form No. 70-119 (Revised 12/65 cbc)		Signing this Notice	e is not an admission of guilt AGCS2M00097

KS

110 Union Street, Suite 500, Seattle, Washington 98101-2038 206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No. 11339 Cert. Mail No. 9 588 633 576

NOTICE OF VIOLATION

PNo. 36916

Date of Violation: MAY 6		16	atm.
Name	Responsible Person, Title		
Ash Grove Coment Co.	Henrik Vo	Idback	Manager
Location of Violation (Address)	City	Zip	County
3801 E. Marginal Way So.	Seattle	98134	King
Mailing Address	City, State	Zip	Phone
As Above	Seatle, WA.	98134	623-5596
□ Section 5.05(e) Failure to develop and implement an operation and a Failure to obtain Notice of Construction approval proval	maintenance plan. ior to construction/installation aggregating more than 3 stics/duration so as to be injuse of best available control ole control technology. ad onto a paved public road as equipment or control appay equipment in an enclosed working order. Condition No. 68 TO TON ORDE are ordered to submit a write se to take, including a schedule.	ion/establishment of minutes/hour. urious or interfere w technology. lway. aratus. area with filtered ex	a source. ith enjoyment of life/property chaust and vertical stack. X 1 Ar AVC ten (10) days of receipt of
Issued By Air Pollution Inspector Form No. 70-119 (Revised 12/95 cbc) Date/Time K S	Received By:	Signing this Notice is	not an admission of guilt AGCS2M000972

Registration No. 11339 Cert. Mail No. P 588

110 Union Street, Suite 500, Seattle, Washington 98101-2038 206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Nd. 36917

NOTICE OF VIOLATION

Date of Violation: MAY 8		96	atm.
Name	Responsible Person, Tit	le	
Ash Grove Cement Co.	Henrik Vo	ldback	Manager
Location of Violation (Address)	City	Zip	County
3801 E. Marginal Way So.	Seattle	98134	king
Mailing Address	City, State	Zip	Phone
As Above	Seattle, WA.	98134	623 - 5596
DID UNLAWFULLY CAUSE REGULATION OF THE PUGET S Section 5.05(e) Failure to develop and implement an operation and Failure to obtain Notice of Construction approval provided Section 9.03(a) Visible emissions in excess of 20% opacity for personal Section 9.11(a) Emission of air contaminant in quantities/character Section 9.12(b) Emission of odor-bearing air contaminants without	sound AIR POLLUTIO maintenance plan. prior to construction/installate iods aggregating more than 3 istics/duration so as to be inj	N CONTROL A ion/establishment minutes/hour. iurious or interfere	AGENCY FOR: of a source.
 □ Section 9.15(a) □ Section 9.15(b) □ Section 9.15(c) □ Section 9.16 □ Section 9.16 □ Section 9.20 □ Secti	able control technology. oad onto a paved public road ess equipment or control app ray equipment in an enclosed working order.	iway. paratus.	l exhaust and vertical stack.
O Section Emissions from the Main Stack		706 ppm	NOX 1 Hr Ave
☐ Section			
FACTS ALLEGED TO CONSTITUTE A VIOLATION MAY	1996 CEN	REPOR	<i>†</i>
CORRECTIVE Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 yo this Notice describing the necessary corrective action you have taken or prop regulations, and take the following necessary corrective action:	u are ordered to submit a w	ritten report with	in ten (10) days of receipt of ontinuous compliance with the
	115		
Issued By: Air Pollution Dissector Date/Time	Received By:	Signing this Notice	e is not an admission of guilt
Form No. 70-119 (Revised 12/95 cbc)			AGCS2M000973

KS

Registration No. 11339 Cert. Mail No. P 588 633 576

. Air Pollution Inspector Form No. 70-119 (Revised 12/95 cbc) 110 Union Street, Suite 500, Seattle, Washington 98101-2038 206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

180. 36918

NOTICE OF VIOLATION

Date of Violation: May	. 19_0	16	at,m.
Ash Grove Cement Co.	Responsible Person, Title Henrik Vo		M -
Location of Violation (Address)	City	Zip	Manager
3801 E. Marginal Way So.	Seattle	98134	King
Mailing Address	City, State	Zip	Phone
As Above	Seattle, WA.	98134	623-5596
Section 5.05(e) Section 5.05(e) Section 6.03(a) Section 6.03(a) Section 9.03(a) Section 9.11(a) Section 9.12(b) Section 9.15(a) Section 9.15(c) Section 9.15(c) Section 9.15(c) Section 9.16 Section 9.1			ith enjoyment of life/property.
FACTS ALLEGED TO CONSTITUTE A VIOLATION MAY 1996 CEM REPORT			
CORRECTIVE A Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you his Notice describing the necessary corrective action you have taken or proporegulations, and take the following necessary corrective action:	are ordered to submit a wr	itten report within	ten (10) days of receipt of inuous compliance with the
A. Dal			

Received By:

KS

Signing this Notice is not an admission of guilt

Registration No. 11339 Cert. Mail No. P 588 633 576 110 Union Street, Suite 500, Seattle, Washington 98101-2038 206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

No.

NOTICE OF VIOLATION

Date of Viola	ation: May 10		96	atm.
Name		Responsible Person, Tit	tle	
Ash Gr	ove Cement CO.	Henrik V	oldback	Manage -
Location of Violat	ion (Address)	City	Zip	County
3801	E. Marginal Way So.	Seattle	98134	King.
Mailing Address		City, State	Zip	Phone
A5 1	abore	Seattle, WA	98134	623-5596
2.0	DID UNLAWFULLY CAUSE	OR ALLOW VIO		
Section	Failure to develop and implement an operation an Failure to obtain Notice of Construction approval Visible emissions in excess of 20% opacity for pe Emission of air contaminant in quantities/characte Emission of odor-bearing air contaminants without Emission of fugitive dust without use of best availabeposition of mud, dirt, or debris from vehicle or Emission of fugitive dust from manufacturing pro Failure to apply VOC-containing material using spailure to operate and maintain equipment in good Failure to meet Order of Approval No. 5730	prior to construction/installariods aggregating more than ristics/duration so as to be in at use of best available control able control technology. load onto a paved public roacess equipment or control appray equipment in an enclosed working order. Condition No. 68	3 minutes/hour. ajurious or interfere bl technology. adway. aparatus. ad area with filtered	with enjoyment of life/propert
this Notice describing	CORRECTIVE of Section 3.09 of Regulation I and RCW 70.94.211 y g the necessary corrective action you have taken or pro the following necessary corrective action:	ACTION ORDER ou are ordered to submit a way pose to take, including a sch	ritten report with	n ten (10) days of receipt of ntinuous compliance with the
affin	Muster	196	3	
Issued By: A Form No. 70-119 (Revised	ir Pollution Lespector Date/Tim	Received By:	Signing this Notice	is not an admission of guilt AGCS2M000975

KS

Registration No. 11339 Cert. Mail No. F 588 633 576

Form No. 70-119 (Revised 12/95 cbc)

110 Union Street, Suite 500, Seattle, Washington 98101-2038 206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

No. 36920

Signing this Notice is not an admission of guilt

AGCS2M000976

NOTICE OF VIOLATION

Date of Violation: MAY 5		76	atm.
Name	Responsible Person, Title		
Ash Grove Cement Co.	Henrik Vol	ldbaek 1	Nanage r
Location of Violation (Address)	City	Zip	County
3801 E Marginal Way So.	Seattle	98134	King
Mailing Address	City, State	Zip	Phone U
As Above	Seattle, WA.	98134	623-5596
DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF: REGULATION OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR: Section 5.05(e) Failure to develop and implement an operation and maintenance plan. Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source. Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour. Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology. Section 9.15(a) Emission of fugitive dust without use of best available control technology. Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway. Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus. Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack. Failure to operate and maintain equipment in good working order. Failure to meet Order of Approval No. 5730 Condition No. 6B Section Emission of Approval No. 5730 Condition No. 6B Section Emission of Approval No. 5730 Condition No. 6B Section Emission of From No. 2 In Apple Section Process In Apple Secti			
FACTS ALLEGED TO CONSTITUTE A VIOLATION MAY 1996 CEM Report			
CORRECTIVE ACTION ORDER Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:			
ssued By: What Will 9/12/96	Received By:		

Date/Time

KS



September 23, 1996

Neal J. Shulman
Puget Sound Air Pollution Control Agency
110 Union Street, Suite 500
Seattle WA 98101-2038

Dear Mr. Shulman:

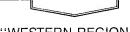
Re: Notices of Violation 36912 - 36921

The following is in response to your letter dated September 10, 1996 and received September 13, 1996.

NOV # 36912:

The hourly average for SO₂ concentration between the hours of 9:00 and 10:00 on 5/6/95 was 251 ppmc. During this time we were in the preheat stage of our startup. At this time we are heating the system with a gas flame at a rate of about 1/4 the heat input of normal operations. To not cause undue to the system, and to ensure proper heating, the combustion air flow rate is also 1/4 our normal rate. Running the system at this low flow rate does not allow us to add the dry sorbent to the gas stream to scrub sulfur. At this low air flow rate, the sorbent would not be caught in the air stream to scrub our gaseous emissions. It would settle out in the flat spots or transition areas of our duct work, where it would be ineffective. We started production at 9:55 and at this time started adding lime to scrub the sulfur. The excess emissions were brought within our permit limits immediately. The source of the sulfur is material that is present in the system from the previous shutdown. It is impossible to remove this material without causing undue damage to the kiln system, in particular the kiln's refractory lining.

This incident should be exempt from penalty under WAC 173-400-107 section 4. The excess emissions were due to startup and are unavoidable. They could not have been prevent through better planning or design. We could not use the lime scrubbing system at this time as it would cause severe property damage.



"WESTERN REGION"

NOV # 36913:

At 8:00, 5/4/96 there was a spike in our CO level through the kiln system over 2.5%. This automatically removed fuel from the system. It is unknown what caused the high CO levels, as the kiln was operating fairly stably at the time. When the CO was purged from the system, gas was put back on the kiln. The kiln began to heat up at this time causing the hourly average for NO_x between the hours of 09:00 and 10:00 to reach 751 ppmc. The operator took steps to stabilize and cool the kiln.

NOV # 36914:

The kiln had been shut down at 00:15 on 5/5/96. At 00:30, feed was put back on. There were two hours after this which showed NO_X over 700 ppmc. Between 01:00 and 03:00 the NO_X averages were 781 ppmc and 823 ppmc. This period however fell under startup and should be subject to the startup limit of 1000 ppmc.

NOV # 36915:

The kiln had been shut down at 07:30 on 5/7/96. At 07:50 the flame was put back in the kiln, and at 08:00 feed was put back on. For the hour between 08:00 and 09:00 the NO_X average was 720 ppmc. This period however fell under startup and should be subject to the startup limit of 1000 ppmc.

NOV # 36916:

The kiln had been shut down at 03:45 on 5/5/96. At 16:00 the flame was put back in the kiln, but was taken off again at 20:45. The flame was put back on 5/6/96 at 00:00. At 09:55 feed was put back on. For the hour between 12:00 and 13:00 the NO_X average was 780 ppmc. This period however fell under startup and should be subject to the startup limit of 1000 ppmc.

NOV # 36917:

The kiln had been shut down at 07:30 on 5/7/96. At 07:50 the flame was put back in the kiln, and at 08:00 feed was put back on. For the hour between 03:00 and 04:00 the NO_X average was 735 ppmc. This period however fell under startup and should be subject to the startup limit of 1000 ppmc.



"WESTERN REGION"

NOV # 36918:

The kiln had been shut down at 06:54 on 5/9/96. At 07:15 the flame was put back in the kiln, and at 07:25 feed was put back on. For the hour between 08:00 and 09:00 the NO_X average was 849 ppmc. This period however fell under startup and should be subject to the startup limit of 1000 ppmc.

NOV # 36919:

The kiln had been shut down at 16:05 on 5/10/96. At 16:20 the flame was put back in the kiln, and at 16:35 feed was put back on. For the hour between 18:00 and 19:00 the NO_X average was 713 ppmc. This period however fell under startup and should be subject to the startup limit of 1000 ppmc.

NOV # 36920:

The kiln had been shut down at 21:00 on 5/5/96. At 23:00 the flame was put back in the kiln, and at 23:10 feed was put back on. Between 14:00 and 16:00 the NO_X hourly averages were 810 ppmc and 840 ppmc. Between 18:00 and 20:00 the NO_X hourly averages were 784 ppmc and 864 ppmc. Between 21:00 and 22:00 the NO_X hourly average was 784 ppmc. These periods however fell under startup and should be subject to the startup limit of 1000 ppmc.

NOV # 36921:

In the late morning of 5/3/96, the opacity from the main baghouse began to rise slowly. The bag house showed to be operating normally. There were no jumps or sudden drops in the opacity that would indicate problems with a specific compartment and all the operating pressures and temperatures appeared normal. Upon visual inspection of the stack, a light brown plume was noticed. This color plume is typical with high NO_x emissions. This was also consistent with our emissions levels at the time. The operator was already taking steps to reduce the NO_x emissions. The hourly opacity average between 12:00 and 13:00 was 7.5 %. This was brought down within the 5% limit as process changes were made to reduce the NO_x emissions.

Sincerely,

J. Trygve Grey

Assistant Plant Superintendent



AIR KITSAP COUNTY POLLUTION

PIERCE COUNTY

CONTROL AGENCY

SNOHOMISH COUNTY

April 17, 1997

Henrik Voldbaek, Manager Ash Grove Cement Company 3801 E Marginal Way S Seattle, WA 98134

Dear Mr. Voldbaek:

Disposition of Notice of Violation No. 36921

The above referenced Notice of Violation was issued as a result of Ash Grove's May 1996 Continuous Emission Report which reflected a violation on May 3, 1996, of this Agency's Regulation I, Section 9.09(b)(2).

The file regarding this matter was misplaced within our office and, as a result, an inordinate amount of time has elapsed since the Notice of Violation was issued to Ash Grove.

Therefore, we are closing Notice of Violation No. 36921 and will be taking no further enforcement action in this case. If you have any questions concerning this matter, please contact me at 689-4095.

eal J. Shulman

Manager-Inspection

cc: Elizabeth Gilpin, Air Pollution Inspector

Melissa McAfee, Air Pollution Inspector Fred L. Austin, Air Pollution Engineer

Rosemary G. Busterna, Senior Air Pollution Inspector

Laurie Halvorson, General Counsel

NJS/cbc

AGCS2M000980

Dennis J. McLerran, Air Pollution Control Officer

BOARD OF DIRECTORS

Commissioner, Kitsap County Member at Large Mayor, Everett Mayor, Bremerton Snohomish County Council King County Executive

Mayor, Tacoma Mayor, Seattle Pierce County Executive Registration No. 1133 9 Cert. Mail No. P 588 633 576

Form No. 70-119 (Revised 12/95 cbc)

110 Union Street, Suite 500, Seattle, Washington 98101-2038 206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

No. 36921

NOTICE OF VIOLATION

Date of Violation: May 3		6	atm.
Name	Responsible Person, Title	e	
Ash Grove Coment Co.	Henrik Vola	lbaek 1	Manager
Location of Violation (Address)	City	Zip	County
3801 E Marginal Way So.	Scattle	98134	King
Mailing Address	City, State	Zip	Phone
As Above	Seattle Wa	98134	G23-5596
DID UNLAWFULLY CAUSE REGULATION OF THE PUGET S	OR ALLOW VIOLOUND AIR POLLUTION		
Section 5.05(e) Section 5.05(e) Section 6.03(a) Section 9.03(a) Section 9.03(a) Section 9.11(a) Section 9.11(b) Section 9.15(a) Section 9.15(c) Section 9.15(c) Section 9.15(c) Section 9.15(c) Section 9.16 Section 9.16 Section 9.16 Section 9.10 Section 9.10 Section 9.10 Section 9.10 Section 9.10 Section 9.10 Section 9.15(c) Section 9			
CORRECTIVE ACTION ORDER Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of			
this Notice describing the necessary corrective action you have taken or proporegulations, and take the following necessary corrective action:	ose to take, including a sche	quie, to achieve con	iniuous compilance with the
	1)		

Received By:

Signing this Notice is not an admission of guilt

AGCS2M000981

Date/Time

KS



KING COUNTY

AIR KITSAP COUNTY POLLUTION PIERCE COUNTY

SNOHOMISH COUNTY

AGENCY

CONTROL

July 26, 1996

Reg. No. 11339

Henrik Voldbaek Ash Grove Cement Co. 3801 E Marginal Way S Seattle, WA 98134

Dear Mr. Voldbaek:

The Agency has reviewed your April 1996 CEM Report. Please find enclosed Notices of Violation No. 35765, 35766, 35767, 35768, 35769. Also, find case closure letters for Notices of Violation No. 35765, 35766, 35767, and 35769.

In the future, when opacity exceedances are attributed to steam, Ash Grove must submit the Method 9 observation records and certifications of the readers along with the CEM Report.

Please feel free to call me if you have any questions at 689-4055.

Sincerely,

Fred L. Austin

Air Pollution Engineer

cc:

Elizabeth M. Gilpin, PSAPCA Melissa McAfee, PSAPCA Rosemary G. Busterna, PSAPCA

MM/cbc

Dennis J. McLerran, Air Pollution Control Officer

BOARD OF DIRECTORS



AIR

POLLUTION

CONTROL

AGENCY

KING COUNTY

KITSAP COUNTY

PIERCE COUNTY

SNOHOMISH COUNTY

July 3, 1996

Reg. No. 11339

Henrik Voldbaek Ash Grove Cement Co. 3801 E Marginal Way S Seattle, WA 98134

Dear Mr. Voldbaek:

Disposition of Notice of Violation No. 35765, 35766, 35767, and 35769

Based on the information you provided to us in your April 1996 CEM Report dated May 23, 1996, this Agency considers the above-referenced matter closed and will take no further enforcement action in this case.

If you have any questions concerning this matter, please contact me at 689-4078.

Sincerely,

Meal J. Shulman

Manager - Inspection

cc:

Rosemary G. Busterna, PSAPCA Elizabeth M. Gilpin, PSAPCA Melissa McAfee, PSAPCA Fred L. Austin, PSAPCA

EMG\cbc

Dennis J. McLerran, Air Pollution Control Officer

BOARD OF DIRECTORS

Chairman: Win Granlund, Commissioner, Kitsap County Janet Chalupnik, Member at Large Edward D. Hansen, Mayor, Everett Lynn S. Horton, Mayor, Bremerton R.C. Johnson, Councilman, Snohomish County Gary Locke, King County Executive Harold G. Moss, Mayor, Tacoma Norman B. Rice, Mayor, Seattle Doug Sutherland, Pierce County Executive

NOTICE	\mathbf{OE}	VIOI	ATION

A	A
	The said h
No.	35765
PUO.	UUIUU

Cert. Mail No NOTICE OF VIOLATION			
Date of Violation: April 29	, 19 9	6	atm.
Name	Responsible Person, Titl	le	
Ash Grove Cement Co.	Henrik V	^l oldback	Manager
Location of Violation (Address)	City	Zip	County
3801 E Marginal Wy 50.	Scattle	98134	King
Mailing Address	City, State	Zip	Phone
as above	Seattle, WA.	98134	(206)623-5596
DID UNLAWFULLY CAUSE	OR ALLOW VIO		
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CORRECTIVE Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 your this Notice describing the necessary corrective action you have taken or propregulations, and take the following necessary corrective action:	ACTION ORDE	R	in ten (10) days of receipt of ontinuous compliance with the
Issued By: Air Polludon Inspector Form No. 70-119 (Revised 12/95 cbc) Date/Time	Received By:	Signing this Notice	e is not an admission of guilt AGCS2M000984

110 Union Street, Suite 500, Seattle, Washington 98101-2038 206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No	11339

NOTICE OF VIOLATION

No.	35766

Cert. Mail 140 11011C12 Of	VIOLATIC)1 1	
Date of Violation: April 29		96	atm.
Name	Responsible Person, Titl	e	
8			
Ash Grove Cement Co.	Henrik Vola	Lback	Manager
			J.
Location of Violation (Address)	City	Zip	County
3801 E marginal Wy 50.	Seattle	98134	King
Mailing Address	City, State	Zip	Phone
as above	Seattle WA	98134	(206) 623-5596
DID UNLAWFULLY CAUSE	OR ALLOW VIO	LATION OF:	
	OUND AIR POLLUTION		
Section 5.05(e) Failure to develop and implement an operation and			
 □ Section 6.03(a) Failure to obtain Notice of Construction approval pr □ Section 9.03(a) Visible emissions in excess of 20% opacity for period 			à a source.
☐ Section 9.03(a) Visible emissions in excess of 20% opacity for period Section 9.11(a) Emission of air contaminant in quantities/characteristics.			with enjoyment of life/property.
☐ Section 9.12(b) Emission of odor-bearing air contaminants without			J - J
Section 9.15(a) Emission of fugitive dust without use of best available			
Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or lo		-	
☐ Section 9.15(c) Emission of fugitive dust from manufacturing proce ☐ Section 9.16 Failure to apply VOC-containing material using spra			exhaust and vertical stack.
Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack. Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack. Failure to operate and maintain equipment in good working order.			
Failure to meet Order of Approval No, Condition No			
section 9.69(b)(1) emissions shall not, exceed 20% opacity for more than			
3 minutes in any 1 hr. as determined by a CEMS.			
□ Section			
			•
FACTS ALLEGED TO CONSTITUTE A VIOLATIONAcr	11 1996 CE	m repor	t
CORRECTIVE A	CTION ORDE	R	
Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you			ten (10) days of receipt of
this Notice describing the necessary corrective action you have taken or propo	se to take, including a sche	dule, to achieve con	tinuous compliance with the
regulations, and take the following necessary corrective action:			
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And Chit			
jugo gusur			
ssued By: Che Shalk Still 712/64.	Received By:		
Air Pollution Inspect of Date/Time	The state of the s	Signing this Notice	is not an admission of guilt
Form No. 70-119 (Revised 12/95 cbc)	と		AGCS2M000985

Registration No	11339
Cert Mail No	•

Air Pollation Inspector Form No. 70-119 (Revised 12/95 cbc)

NOTICE OF VIOLATION

263	-
No.	35767

	VIOLATIC	714			
Date of Violation: April 25		6	atm.		
Name	Responsible Person, Titl	e			
Ash Grove Cement Co.	Henrik Vold	baek Pla	int Manager		
Location of Violation (Address)	City	Zip	County		
3801 E Marginal Wy So.	Seattle	98134	King		
Mailing Address	City, State	Zip	Phone		
as above	Seattle, WA	98134	(206) 623-5596		
REGULATION OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR: Section 5.05(e) Failure to develop and implement an operation and maintenance plan. Section 9.03(a) Sible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour. Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property Section 9.12(b) Emission of fugitive dust without use of best available control technology. Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway. Section 9.15(c) Emission of fugitive dust without use of best available control technology. Section 9.15(c) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway. Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus. Section 9.20 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack. Section 9.20 Failure to operate and maintain equipment in good working order. Failure to operate and maintain equipment in good working order. Failure to meet Order of Approval No. 5730 Condition No. 6 (B) Section Emission of fugitive dust from the main bag hourse stack not to exceed 700 ppm NOX 1 hr. Ave. CORRECTIVE ACTION ORDER Inder the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of his Notice describing the necessary corrective action on what taken or propose to take, including a schedule, to achieve continuous compliance with the egulations, and take the following necessary corrective action:					
Mildle Jake					

Received By: _

Signing this Notice is not an admission of guilt

110 Union Street, Suite 500, Seattle, Washington 98101-2038 206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No	11339
Cert. Mail No.	

NOTICE OF VIOLATION

	*
	The same of the
No.	35769
NO.	

DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF: REGULATION OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR: Section 5.05(e) Failure to develop and implement an operation and maintenance plan. Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source. Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour. Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/prints of fugitive dust without use of best available control technology. Section 9.15(a) Emission of fugitive dust without use of best available control technology. Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway. Emission of fugitive dust from manufacturing process equipment or control apparatus. Section 9.15(c) Emission of fugitive dust from manufacturing process equipment in an enclosed area with filtered exhaust and vertical stack Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack Section 9.20 Failure to operate and maintain equipment in good working order. Failure to meet Order of Approval No. 5.73.0 Condition No. 6.4 Section BagHouse Emission of Main Stack Action ORDER FACTS ALLEGED TO CONSTITUTE A VIOLATION April 1996 CEm report CORRECTIVE ACTION ORDER Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receip	Date of Violation: April 30		6	atm.		
Location of Violation (Address) 380 E Marginal Wy 50. Mailing Address City, State Scattle, WA. DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF: REGULATION OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR: Section 5.05(e) Section 6.03(a) Section 9.03(a) Section 9.11(a) Section 9.11(b) Section 9.15(b) Section 9.15(b) Section 9.15(c) Section 9.15(c)	Name	Responsible Person, Title				
Mailing Address AS Above DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF: REGULATION OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR: Section 5.05(e) Section 6.03(a) Section 9.03(a) Section 9.03(a) Section 9.12(b) Section 9.15(a) Section 9.15(a) Section 9.15(b) Section 9.15(c) Secti	Ash Grove Cement Co.	Henrik Vol	dbae k	Manager		
Mailing Address A5 Above DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF: REGULATION OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR: Section 5.05(e) Section 6.03(a) Section 9.03(a) Section 9.11(a) Section 9.11(b) Section 9.15(b) Section 9.15(b) Section 9.15(c) Section 9.15(c) Section 9.15(c) Section 9.15(c) Section 9.16 Section 9.15	Location of Violation (Address)	City	Zip	County		
DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF: REGULATION OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR: Section 5.05(c) Section 5.05(c) Section 9.03(a) Section 9.03(a) Section 9.11(a) Section 9.11(b) Section 9.12(b) Section 9.15(a) Section 9.15(a) Section 9.15(b) Section 9.15(c) Section 9.15(c) Section 9.15(c) Section 9.15(c) Section 9.15(c) Section 9.16 S	3801 E Marginal Wy So.	Seattle	98134	King		
DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF: REGULATION OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR: Section 5.05(e) Failure to develop and implement an operation and maintenance plan. Section 9.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source. Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour. Section 9.12(b) Emission of dir contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/pring Emission of fugitive dust without use of best available control technology. Section 9.15(a) Emission of fugitive dust without use of best available control technology. Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway. Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus. Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack for apply voc-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack for apply voc-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack for apply voc-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack for apply voc-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack for apply voc-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack for apply voc-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack for apply voc-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack for apply voc-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack for apply voc-containing apply voc-conta	Mailing Address	City, State	Zip	Phone		
REGULATION OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR: Section 5.05(e) Failure to develop and implement an operation and maintenance plan. Section 9.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source. Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour. Section 9.11(a) Emission of air contaminant in quantities/characteristics/enarcter	as above	Scattle, WA.	98134	(206) 623-5596		
Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receip	Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source. Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour. Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property. Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology. Section 9.15(a) Emission of fugitive dust without use of best available control technology. Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway. Emission of fugitive dust from manufacturing process equipment or control apparatus. Section 9.16 Section 9.16 Section 9.16 Section 9.20 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack. Section 9.20 Failure to operate and maintain equipment in good working order. Failure to meet Order of Approval No. 5.730, Condition No. 6.4 Section Section Section Section					
nis Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance will egulations, and take the following necessary corrective action:	Inder the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you his Notice describing the necessary corrective action you have taken or proportion.	are ordered to submit a wr	itten report within	ten (10) days of receipt of tinuous compliance with the		
trel & Muste	the fellet					

Received By: _

Signing this Notice is not an admission of guilt



AIR

POLLUTION

CONTROL

AGENCY

KING COUNTY

KITSAP COUNTY

PIERCE COUNTY

SNOHOMISH COUNTY

July 3, 1996

Reg. No. 11339

Henrik Voldbaek Ash Grove Cement Co. 3801 E Marginal Way S Seattle, WA 98134

Dear Mr. Voldbaek:

Disposition of Notice of Violation No. 35764

Based on the information you provided to us in your March 1996 CEM Report dated April 30, 1996, this Agency considers the above-referenced matter closed and will take no further enforcement action in this case.

If you have any questions concerning this matter, please contact/me at 689-4078.

Sincerely,

Neal J. Shulman

Manager - Inspection

cc: Rosemary G. Busterna, PSAPCA

Elizabeth M. Gilpin, PSAPCA Melissa McAfee, PSAPCA

Fred L. Austin, PSAPCA

EMG\cbc

Dennis J. McLerran, Air Pollution Control Officer

BOARD OF DIRECTORS

10 Onion Sueet,	D	une 300, Seame,	VV	аэши	B
206-343-8800	/	1-800-552-3565	/	Fax	2

	" ALMA
No.	35764

Registration No. 11339 206-343-8800 / 1-800-5	52-3565 / Fax 206-343 F VIOLATIO		No. 35764
Date of Violation: March 3	. 19_0		atm.
Ash Grove Cement Co.	Responsible Person, Title Henrik Vola		Plant Munager
Location of Violation (Address)	City	Zip	County
3801 E. Marginal Wy. 50.	Seattle	98134	King
Mailing Address	City, State	Zip	Phone
as aborc	Seattle, WA	98134	(206) 623-5596
Section 6.03(a) Section 9.03(a) Visible emissions in excess of 20% opacity for peri Emission of air contaminant in quantities/character. Emission of odor-bearing air contaminants without Emission of fugitive dust without use of best availance Section 9.15(b) Section 9.15(c) Emission of fugitive dust from manufacturing process Section 9.16 Section 9.16 Section 9.20 Failure to apply VOC-containing material using sprocess Section 9.20 Failure to operate and maintain equipment in good Failure to meet Order of Approval No. Section 9.09 Section 9.00 Section 9	ods aggregating more than a sistics/duration so as to be injuse of best available control ble control technology. The condition of the control appray equipment or control appray equipment in an enclose working order.	minutes/hour. durious or interfere l technology. dway. daratus. d area with filtered	with enjoyment of life/property
FACTS ALLEGED TO CONSTITUTE A VIOLATION MAPLE CORRECTIVE	П	report	
Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 yo this Notice describing the necessary corrective action you have taken or propregulations, and take the following necessary corrective action:	u are ordered to submit a w	ritten report with	in ten (10) days of receipt of ontinuous compliance with the
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full HILL			

Air Pollution Inspector Form No. 70-119 (Revised 12/95 cbc)

Received By:

Signing this Notice is not an admission of guilt



PUGET SOUND KING COUNTY

AIR

POLLUTION

CONTROL

AGENCY

KITSAP COUNTY PIERCE COUNTY

SNOHOMISH COUNTY

May 1, 1996

Gerry Brown Ash Grove Cement Co. 3801 E. Marginal Way S. Seattle, WA 98134

RECEIVED

MAY - 8 1996

AGCW-SEATTLE

Dear Mr. Brown:

Disposition of Notice of Violation No. 35757 Registration No. 11339

Based on the information you provided to us in your addendum to the February 1996 CEM Report, this Agency considers the above-referenced matter closed and will take no further enforcement action in this case. The Agency concurs that the WAC 173-400-107 applies.

If you have any questions concerning this matter, please contact me at 689-4078.

Sincerely,

Meal J. Shulman Manager - Inspection

cc:

Rosemary G. Busterna, PSAPCA Melissa McAfee, PSAPCA Fred L. Austin, PSAPCA

EMG\cbc

Dennis J. McLerran, Air Pollution Control Officer

OARD OF DIRECTORS

Chairman: Win Granlund, Commissioner, Kitsap County Janet Chalupnik, Member at Large Edward D. Hansen, Mayor, Everett

Lynn S. Horton, Mayor, Bremerton R.C. Johnson, Councilman, Snohomish County Gary Locke, King County Executive

Harold G. Moss, Mayor, Tacoma Norman B. Rice, Mayor, Seattle Doug Sutherland, Pierce County Executive



PUGET

SOUND

AIR

POLLUTION

CONTROL

AGENCY

KING COUNTY

KITSAP COUNTY

PIERCE COUNTY

SNOHOMISH COUNTY

March 3, 1997

Ash Grove Cement Co. Henrik Voldbaek 3801 E Marginal Way S Seattle, WA 98134

Disposition of Notice of Violation Nos 36210, 36211, 36212, and 36213 Registration No. 11339

Dear Mr. Voldback:

Based on the information you provided to us in your January 1997 CEM Report, this Agency considers NOV No. 36213 closed and will take no further enforcement action in this case.

Notices of Violation Nos. 36210, 36211, and 36212 remain open. Please respond to the correction action order on NOVs 36210 and 36211 within 10 days.

If you have any questions concerning this matter, please contact me at 689-4078.

Sincer

Manager - Inspection

cc:

Rosemary G. Busterna, PSAPCA Elizabeth M. Gilpin, PSAPCA Melissa McAfee, PSAPCA Fred L. Austin, PSAPCA

EMG\cbc

Dennis J. McLerran, Air Pollution Control Officer

R D O F DIRECTORS

Commissioner, Kitsap County Member at Large Mayor, Everett

Mayor, Bremerton Snohomish County Council King County Executive

Mayor, Tacoma Mayor, Seattle Pierce County Executive

AGCS2M000991

FAX: (206) 343-7522 printed on recycled paper

110 Union Street, Suite 500, Seattle, Washington 98101-2038 206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

NOTICE OF VIOLATION

No.	36213
PO.	SOUT

Registration No	113	30	
Cert. Mail No.	37	TU	DMO CO

Nam

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Date of Violation: January 3/	, 19	97	atm.
e	Responsible Person, Tit	le	
st Grove Cement Co.	Henrik Vo	ldback	Manager
tion of Violation (Address)	City	Zip	County
3801 E Marginal Wy So.	Seattle	98134	Kinz
ng Address	City, State	Zip	Phone
	S 111 1./4	041211	(200) 623-5590

Loca Maili AS Above DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF: OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR: REGULATION Section 5.05(e) Failure to develop and implement an operation and maintenance plan. Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source. Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour. Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property. Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology. Section 9.15(a) Emission of fugitive dust without use of best available control technology. Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway. Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus. Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack. Section 9.20 Failure to operate and maintain equipment in good working order. Failure to meet Order of Approval No. 5730, Condition No. 6/1 Section FACTS ALLEGED TO CONSTITUTE A VIOLATION ________ CORRECTIVE ACTION ORDER Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of Received By:

this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:

Air Pollution I Form No. 70-119 (Revised 12/95 cbc)

Signing this Notice is not an admission of guilt

AGCS2M000992



PUGET SOUND

KING COUNTY

AIR KITSAP COUNTY POLLUTION

PIERCE COUNTY

SNOHOMISH COUNTY

AGENCY

CONTROL

March 27, 1997

Ash Grove Cement Co. Henrik Voldbaek 3801 E Marginal Way S Seattle, WA 98134

Disposition of Notice of Violation Nos. 36210, and 36211 Registration No. 11339

Dear Mr. Voldbaek:

Based on the information you provided to us in your corrective action letter dated March 17, 1997, this Agency considers the above referenced matter closed and will take no further enforcement action in this case. If this problem of steam forming in the stack should recur in the future, please submit stack temperature, stack flow rate, moisture content of materials in the kiln and an estimation of the moisture content of the exhaust gas stack.

If you have any questions concerning this matter, please contact me at 689-4078.

Neal J. Shulman

Manager - Inspection

cc:

Rosemary G. Busterna, PSAPCA Elizabeth M. Gilpin, PSAPCA Melissa McAfee, PSAPCA Fred L. Austin, PSAPCA

EMG\cbc

RECEIVED

MAR 3 1 1997

/ JEATTLE

Dennis J. McLerran, Air Pollution Control Officer

BOARD OF DIRECTORS

AGCS2M000993

Commissioner, Kitsap County Member at Large Mayor, Everett Mayor, Bremerton Snohomish County Council King County Executive Mayor, Tacoma Mayor, Seattle Pierce County Executive Registration No. 1339
Cert. Mail No. 2371603090

Date of Violation: _

January

110 Union Street, Suite 500, Seattle, Washington 98101-2038 206-343-8800 / 1-800-552-3565 / Fax 206-343-7522



36211

NOTICE OF VIOLATION

Name	Responsible Person, Titl	e	
Ash Grove Cement Co.	Henrik Vo	1dba eK	Manager
Location of Violation (Address)	City	Zip	County
3801 E Marginal Wy 50.	Seattle	98134	King
Mailing Address	City, State	Zip	Phone
As Aborc	Scattle, Wa.	98134	(206) 623-5596
DID UNLAWFULLY CAUSE	OR ALLOW VIO	LATION OF:	
	OUND AIR POLLUTION	N CONTROL AG	ENCY FOR:
□ Section 5.05(e) Failure to develop and implement an operation and Section 6.03(a) Failure to obtain Notice of Construction approval provided by Section 9.03(a) Visible emissions in excess of 20% opacity for period Emission of air contaminant in quantities/characterice Emission of odor-bearing air contaminants without Emission of fugitive dust without use of best available Section 9.15(a) Emission of fugitive dust without use of best available Deposition of mud, dirt, or debris from vehicle or location 9.15(c) Emission of fugitive dust from manufacturing process Failure to apply VOC-containing material using sproposition 9.20 Failure to operate and maintain equipment in good Failure to meet Order of Approval No. □ Section 9.09 (b)(2) Violante 1 to ause of the Cause of the Section Section 9.09 (b)(2) Violante 1 to ause of the Cause of the Section 9.20 Section 9.20 Failure to meet Order of Approval No. □ Section 9.09 (b)(2) Violante 1 to ause of the Cause of the Section 9.20 Section 9.20 Failure to meet Order of Approval No. □ Section 9.09 (b)(2) Violante 1 to ause of the Cause	rior to construction/installations aggregating more than 3 stics/duration so as to be injuse of best available control ble control technology. and onto a paved public road ass equipment or control app ay equipment in an enclosed working order.	minutes/hour. urious or interfere w technology. way. aratus. area with filtered ex	ith enjoyment of life/property. khaust and vertical stack. Contaminant hc. Ave.
Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you this Notice describing the necessary corrective action you have taken or proportions, and take the following necessary corrective action: Submit Also provide an engineering analysis Stack Conditions were below the	method 1 fe	itten report within	inuous compliance with the
Issued By: Air Pollution Inspecto Date/Time Form No. 70-119 (Revised 12/95 chs)	Received By:	Signing this Notice is	s not an admission of guilt

110 Union Street, Suite 500, Seattle, Washington 98101-2038 206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

NOTICE OF VIOLATION

Date of Violation: January 27		97	atm.	
Name	Responsible Person, Titl	е	Į.	
Ash Grove Cement Co.	Henrik Vo	ldback	Manager	
Location of Violation (Address)	City	Zip	County	
3801 E Marginal Wy So.	Scattle	98134	King	
Mailing Address	City, State	Zip	Phone	
as above	Scattle, WA.	98134	(206) 623-5596	
DID UNLAWFULLY CAUSE	OR ALLOW VIO	LATION OF	:	
REGULATION OF THE PUGET S	OUND AIR POLLUTIO	N CONTROL A	GENCY FOR:	
Section 5.05(e) Section 5.05(e) Section 5.05(e) Section 6.03(a) Section 6.03(a) Section 9.03(a) Section 9.03(a) Section 9.11(a) Section 9.12(b) Section 9.15(a) Section 9.15(b) Section 9.15(c) Section 9.15(c) Section 9.15(c) Section 9.16 Section 9.16 Section 9.16 Section 9.16 Section 9.10 Se				
FACTS ALLEGED TO CONSTITUTE A VIOLATION		CLM IC	Por 1	
No.	-			
Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you this Notice describing the necessary corrective action you have taken or proper regulations, and take the following necessary corrective action: 5 ubm + method an enquecting analysis documenting the dew point.	are ordered to submit a w	ritten report withi	in ten (10) days of receipt of ntinuous compliance with the	
Issued By: M Aur Pollution Inspector Date/Time	Received By: _	Signing this Notice	is not an admission of guilt	

ASH GROVE CEMENT COMPANY



"WESTERN REGION"

March 17, 1997

Neal J. Shulman Puget Sound Air Pollution Control Agency 110 Union Street, Suite 500 Seattle WA 98101-2038

Dear Mr. Shulman:

Re: Notice of Violation 36210 & 36211

The plume on January 27, 1997 was observed by myself (certificate no. 94-01-60), Jerry Brown (certificate no. 94-01-53) and Bob Morey (certificate no. WA-F96-14). There was no actual recording of the reading as the plume was expected (see January 1996 CEM report).

The stack temperature as it relates to the dew point cannot be obtained as no moisture readings were taken during the startup. A chart of the stack temperatures has been included though. It should be noted that it never exceeded 95 deg. F. during this period (04:00 - 23:00). As stated in the addendum to January's CEM, we had installed a large amount of refractory with a high water content. Included is an in-house report showing that this was about 1,050 cu. ft. Also included is a copy of the report submitted last year by the refractory installer. Using the numbers from the installer (150 lb/cu. ft. And 10% water) we find that this years installation had a moisture content of 15,750 lbs. It can be assumed that all the moisture was released during the heat up (this is part of what the heat up is designed to do).

It should also be noted that during this time there was no feed going to the kiln and the kiln bag house was operating normally. The bag house cannot be bypassed.

Sincerely,

J. Trygve Grey
Process Engineer

	meas.	Lero	span	SUDSL.	LAU	ายยบ					
Time	Value	Cal	Cal	Value					1234567890		
		======	222222	======	==	===	==	===	========	========	
Date: 00:00	01/27 38.75	0.00	0.00	0.00	0	0	0	0	8		
00:00		0.00	0.00	0.00		0	0		8		
00:10		0.00	0.00	0.00	0	Ö	0		8		
00:45		0.00	0.00	0.00		ō	Ō		8		
01:00		0.00	0.00	0.00	0	0	0		8		
01:15		0.00	0.00	0.00	0	0	0	0	8		
01:30		0.00	0.00	0.00	0	0	0		8		
01:45	40.53	0.00	0.00	0.00	0	0	0		8		
02:00	40.30	0.00	0.00	0.00	0	0	0		8		
02:15	40.24	0.00	0.00	0.00	0	0	0		8		
02:30		0.00	0.00	0.00	0	0	0	_	8		
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05:15		0.00	0.00	0.00	0	ő	-		8		
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06:15		0.00	0.00	0.00	0	0			8		
06:30		0.00	0.00	0.00	0	0	0		8		
06:45	67.87	0.00	0.00	0.00	0	0	0		8		
07:00	71.88	0.00	0.00	0.00	0	0	0		8		
07:15	72.01	0.00	0.00	0.00	0	0			8		
07:30	71.26	0.00	0.00	0.00	0	0			8		
07:45		0.00	0.00	0.00	0	0		-	8		
08:00		0.00	0.00	0.00	0	0	_	-	8		
08:15		0.00	0.00	0.00	0	0			8		
08:30		0.00	0.00	0.00	0	0			8		
08:45		0.00	0.00	0.00	0	0	_		8		
09:00		0.00	0.00	0.00	0	0	_		8		
09:15		0.00	0.00	0.00	0	0			8		
09:30		0.00	0.00	0.00 0.00	0	0	_		8		
09:45 10:00		0.00	0.00	0.00	0	0			8		
10:15		0.00	0.00	0.00	0	ő			8		
10:13		0.00	0.00	0.00	0	0	_		8		
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12:15		0.00	0.00	0.00	0	0	0		8		
12:30		0.00	0.00	0.00	0	0	0		8		
12:45		0.00	0.00	0.00	0	0	0	_	8		
13:00		0.00	0.00	0.00	0	0	0	-	8		
13:15		0.00	0.00	0.00	0	0	22		8		
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20.20								
15:30	73.84	0.00	0.00	0.00	0	0	0	0
15:45	75.95	0.00	0.00	0.00	0	0	0	0
16:00	77.43	0.00	0.00	0.00	0	0	0	08
16:15	78.67	0.00	0.00	0.00	0	0	0	0
16:30	80.07	0.00	0.00	0.00	0	0	0	0
16:45	81.16	0.00	0.00	0.00	0	0	0	08
17:00	81.97	0.00	0.00	0.00	0	0	0	0
17:15	82.47	0.00	0.00	0.00	0	0	0	0
17:30	82.99	0.00	0.00	0.00	0	0	0	08
17:45	83.28	0.00	0.00	0.00	0	0	0	08
18:00	83.48	0.00	0.00	0.00	0	0	0	08
18:15	83.76	0.00	0.00	0.00	0	0	0	0
18:30	84.40	0.00	0.00	0.00	0	0	0	08
18:45	84.02	0.00	0.00	0.00	0	0	0	0
19:00	81.29	0.00	0.00	0.00	0	0	0	0
19:15	79.99	0.00	0.00	0.00	0	0	0	0
19:30	79.33	0.00	0.00	0.00	0	0	0	0
19:45	80.49	0.00	0.00	0.00	0	0	0	0
20:00	84.01	0.00	0.00	0.00	0	0	0	08
20:15	85.38	0.00	0.00	0.00	0	0	0	0
20:30	86.06	0.00	0.00	0.00	0	0	0	0
20:45	87.18	0.00	0.00	0.00	0	0	0	0
21:00	87.79	0.00	0.00	0.00	0	0	0	0
21:15	88.31	0.00	0.00	0.00	0	0	0	0
21:30	88.82	0.00	0.00	0.00	0	0	0	0
21:45	89.28	0.00	0.00	0.00	0	0	0	0
22:00	90.07	0.00	0.00	0.00	0	0	0	0
22:15	90.39	0.00	0.00	0.00	0	0	0	0
22:30	92.16	0.00	0.00	0.00	0	0	0	0
22:45	93.08	0.00	0.00	0.00	0	0	0	0
23:00	93.60	0.00	0.00	0.00	0	0	0	0
23:15	94.02	0.00	0.00	0.00	0	0	0	0
23:30	94.40	0.00	0.00	0.00	0	0	0	0
23:45	94.81	0.00	0.00	0.00	0	0	0	0

ASH GROVE CEMENT COMPANY



WESTERN REGION
INTER-OFFICE MEMORANDUM
SEATTLE PLANT

Date:

February 5, 1997

To:

Henrik Voldbæk

From:

Nate Fernow

Subject:

January 1997 Kiln Outage & Repairs

Copies:

Mike Dwyer, Bob Morey

The January outage was used to replace several areas of meager refractory that have plagued the plant over the last few years. Listed below are the major areas and the materials that were used in the repairs.

- 1. Calciner Exit, Crossover to Stage 5: This area was original refractory from commissioning and began with a failure that plugged stage 5 shortly after we began to burn tires. It was originally believed that the higher 5TH stage exit temperature was to blame for the plug, but the resultant steel damage in the area was soon discovered and revealed the true nature of the plug. It is my belief that the need to utilize our Cardox system to keep the riser section clear stressed the area with repeated percussion causing an anchoring system failure. The area continued to degrade over the year until it covered about 70% of the north wall of the crossover, ~ 300 sq. ft. of A. P. Green Lo-Abrade was gunned in the area to a full thickness of 9". The refractory was anchored by standard V anchors on ~12" centers.
- 2. Kiln Riser & Feed Hood: This area also had seen severe duty from buildup and using Cardox. It had been patched several times since it was installed during the 1995 Kiln Outage. The material installed at that time was Plibrico's Pligun 36Z, a 10% Zircon gunnite material. We removed all the refractory from the brick retaining ring at the base of the calciner to the feed shelf and replaced it with Pryor-Giggey's Kergun MZ, also a 10% Zircon gunnite material. There was ~1100 sq. ft. of material gunned to a nominal thickness of 9 inches with the corners and lower edges fared to minimize buildup. We were also able to install a test section of a 50% Silicon Carbide refractory on the lower section of the North wall. This was installed in two components, half the thickness of insulating material, followed by the Silicon Carbide material. Material for this trial was supplied by Resco Products.

The steel in the Western wall of the riser had lost its refractory at two or three occasions during the last two years and patched. The resulting damage during the losses had caused the wall to bow outward making repairs to the expansion joint difficult and would have caused further cracking of the joint. We opted to have 70% of the lower wall replaced with new steel and revise the stiffeners to add support that would resist bowing in the future. The labyrinth and flexural components of the expansion joint, the air cannons nozzles, the cardox port sleeves, analyzer probe port, and access doors throughout this section were restored to serviceable condition prior to the refractory installation.



Refractory Sales and Construction Services

February. 28, 1996

Ash Grove Cement Company 3801 E Marginal Way South Seattle, WA 98134

Attention: Mr. Nate Fernow.

Reference: Refractory Dryout - Steaming

Dear Nate

This is to confirm recent discussions regarding steaming that is inherent to the bakeout of newly installed refractory linings, and in particular to those linings installed with castable and/or plastic refractory.

Monolithic refractories (castables and plastics) contain as much as 10% water by weight; and in some instances more. Those instances are quite often insulating castables which contain much higher quantities of cement - thus, the need for additional water to acheive hydration.

During bakeout this water is released as steam. This accounts for the careful bakeout procedures issued by manufacturers to avoid steam explosions. Please review enclosed article.

Your recent bakeout involved approximately 850 cubic feet of monolithic refractory at an average density of 150#/cu. ft. At an estimated mean of 10% water, the bakeout released 12,750# of water, or 1,530 gallons, in the form of steam.

Rainier Refractories appreciates this opportunity to serve your refractory requirements. Should you have questions, or if we may be of assistance to you in any way, please contact me at your convenience.

Respectfully, RAINIER REFRACTORIES, INC

Rick Foltz

cc: Matt Lazzari



PUGET SOUND

KING COUNTY

AIR KITSAP COUNTY POLLUTION

PIERCE COUNTY

CONTROL AGENCY
snohomish county

March 3, 1997

Ash Grove Cement Co. c/o Henrik Voldbaek 3801 E Marginal Way S Seattle, WA 98134

Dear Mr. Voldbaek:

crosed closed closed

Disposition of Notice of Violation Nos. 36207, 36208, and 36209 Registration No. 11339

Based on the information you provided to us in your December CEM Report and corrective action letter dated January 29, 1997, this Agency considers NOV No. 36208 closed and will take no further enforcement action in this case. We concur that the December 23, 1996 event meets the criterion of the WAC 173-400-107(6) excess emissions due to upsets.

The Agency considers NOV No. 36209, in which Ash Grove exceeded the 501 ppm 24 hour NO_x limit on December 14, 1996, closed. We will take no further enforcement action in this case.

Colors Colors

NOV No. 36207 remains open. The Agency believes that this exceedance could have been prevented by having coal readily available on site.

If you have any questions concerning this matter, please contact me at 689-4078.

Sincerely,

Meal J. Shulman

Manager - Inspection

cc:

Rosemary G. Busterna, PSAPCA Elizabeth M. Gilpin, PSAPCA Melissa McAfee, PSAPCA Fred L. Austin, PSAPCA

EMG\cbc

Dennis J. McLerran, Air Pollution Control Officer

OARD OF DIRECTORS

AGCS2M001001

Commissioner, Kitsap County Member at Large Mayor, Everett Mayor, Bremerton Snohomish County Council King County Executive Mayor, Tacoma Mayor, Seattle Pierce County Executive 110 Union Street, Suite 500, Seattle, Washington 98101-2038 206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No	1133	9
Cert. Mail No.	31	603090

NOTICE OF VIOLATION

and the second	# ·····
200	GOAL
No.	4 N. 1911
140.	36208

Date of Violation: December 33		76	atm.			
Name	Responsible Person, Title	91				
Ash Grove Cement. Co.	Henrik Vola	dbaek 1	Nanager			
Location of Violation (Address)	City	Zip	County			
3801 E Marginal Why So.	Sea#1c	98134	King			
Mailing Address	City, State	Zip	Phone			
as Aborc	Scattle, Wa.	98134	(206) 623-5596			
DID UNLAWFULLY CAUSE	OR ALLOW VIO	LATION OF:				
REGULATION OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR: Section 5.05(e) Failure to develop and implement an operation and maintenance plan. Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source. Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour. Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property Section 9.12(b) Emission of door-bearing air contaminants without use of best available control technology. Section 9.15(a) Emission of fugitive dust without use of best available control technology. Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway. Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus. Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack. Section 9.20 Failure to operate and maintain equipment in good working order. Failure to meet Order of Approval No. 5730 Condition No. 6 Section Failure to meet Order of Approval No. 5730 Condition No. 6 Section Failure to meet Order of Approval No. 5730 Condition No. 6 Section Failure to meet Order of Approval No. 5730 Condition No. 6 Section Failure to meet Order of Approval No. 5730 Condition No. 6 Section Failure to meet Order of Approval No. 5730 Condition No. 6 Section Failure to meet Order of Approval No. 5730 Condition No. 6 Section Failure to meet Order of Approval No. 5730 Condition No. 6 Section Failure to meet Order of Approval No. 5730 Condition No. 6 Section Failure to meet Order of Approval No. 5730 Condition No. 6 Section Failure to meet Order of Approval No. 5730 Condition No. 6 Section Failure to meet Order of Approval No. 5730 Condition No. 6 Section Failure to meet Order of Approval No. 5730 Condition No. 6 Section Failure to meet Order of Ap						
FACTS ALLEGED TO CONSTITUTE A VIOLATION December 1996						
CORRECTIVE ACTION ORDER Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of his Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the egulations, and take the following necessary corrective action:						

Air Pollution inspector
Form No. 70-119 (Revised 12/95 cbc)

Date/Time Py

Received By:

Signing this Notice is not an admission of guilt

AGCS2M001002

Registration No. 11339 Cert. Mail No. 2371603090 110 Union Street, Suite 500, Seattle, Washington 98101-2038 206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

NOTICE OF VIOLATION

Date of Violation: December 19		6	atm.
Name	Responsible Person, Titl	e	
Ash Grove Cement Co.	Henrik Vol	dback N	Nanager
Location of Violation (Address)	City	Zip	County
3801 E Marginal Way So.	Seattle	98134	King
Mailing Address	City, State	Zip	Phone
As above	Seattle, WA.	98134	(206) 623-5596
DID UNLAWFULLY CAUSE	OR ALLOW VIO	LATION OF:	
	OUND AIR POLLUTION	N CONTROL AG	ENCY FOR:
Section 5.05(e) Section 6.03(a) Failure to develop and implement an operation and a failure to obtain Notice of Construction approval provided in Section 9.03(a) Section 9.03(a) Visible emissions in excess of 20% opacity for perioder in Emission of air contaminant in quantities/characteristic Emission of odor-bearing air contaminants without use of best available Section 9.15(a) Section 9.15(b) Section 9.15(c) Section 9.16 Section 9.16 Section 9.16 Section 9.16 Section 9.20 Failure to apply VOC-containing material using spreading to operate and maintain equipment an operation and a failure to obtain Notice of Construction approval provided in Emission of air contaminant in quantities/characteristic Emission of odor-bearing air contaminants without use of best available Deposition of flugitive dust without use of best available Deposition of flugitive dust from manufacturing processor Failure to apply VOC-containing material using spreading to provide the function of flugitive dust from manufacturing processor Failure to operate and maintain equipment in good of Failure to meet Order of Approval No. 5730 Section Failure to CONSTITUTE A VIOLATION December 19.0% Section Failure to Occupant and Failure to Occupan	ior to construction/installations aggregating more than 3 stics/duration so as to be injuse of best available control ble control technology. ad onto a paved public road ss equipment or control appay equipment in an enclosed working order. , Condition No	minutes/hour. urious or interfere w technology. way. aratus. l area with filtered ex	ith enjoyment of life/property.
CORRECTIVE A Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you this Notice describing the necessary corrective action you have taken or proporegulations, and take the following necessary corrective action:	are ordered to submit a wr	itten report within	ten (10) days of receipt of tinuous compliance with the
Air Pollution Inspector Form No. 70-119 (Revised 12/95 cbc) Date/Time C	Received By:	Signing this Notice is	s not an admission of guilt AGCS2M001003



PUGET SOUND

 D

AIR POLLUTION

CONTROL

AGENCY

KING COUNTY

KITSAP COUNTY

PIERCE COUNTY

SNOHOMISH COUNTY

March 27, 1997

Ash Grove Cement Co. Henrik Voldbaek 3801 E Marginal Way S Seattle, WA 98134

Disposition of Notice of Violation No. 36207 Registration No. 11339

Dear Mr. Voldbaek:

Based on the information you provided to us in your corrective action letter dated March 13, 1997, this Agency considers the above referenced matter closed and will take no further enforcement action in this case.

If you have any questions concerning this matter, please contact me at 689-4078.

Neal J. Shulman

Sincerely.

Manager - Inspection

cc:

Rosemary G. Busterna, PSAPCA Elizabeth M. Gilpin, PSAPCA Melissa McAfee, PSAPCA Fred L. Austin, PSAPCA

EMG\cbc

RECEIVED

MAR 3 1 1997

AUUW-SEATTLE

Dennis J. McLerran, Air Pollution Control Officer

BOARD OF DIRECTORS

AGCS2M001004

Commissioner, Kitsap County Member at Large Mayor, Everett Mayor, Bremerton Snohomish County Council King County Executive

Mayor, Tacoma Mayor, Seattle Pierce County Executive

Registration No.	11339	1
art Mail No		

Air Pollution Inspector Form No. 70-119 (Revised 12/95 cbc)

NOTICE OF VIOLATION

1 and 10 to	*
14	MOOOF
No.	36207
TAU.	

Date of Violation: December 15			atm.				
Name	Responsible Person, Title						
Ash Grove Cement Co.	Henrik V	óldbaek	Manager				
Location of Violation (Address)	City	Zip	County				
3801 E Marginal Way So.	Seattle	98134	King				
Mailing Address	City, State	Zip	Phone				
as above	Seattle, WA.	98134	(206) 623-5596				
DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF: REGULATION OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR: Section 5.05(e) Failure to develop and implement an operation and maintenance plan. Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source. Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/nour. Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source. Visible emission of in contaminant in quantities/characteristics/duration so as to be injurious or/interfere.with editoyment of life/property. Section 9.12(b) Emission of fugitive dust without use of best available control technology. Section 9.15(e) Emission of fugitive dust without use of best available control technology. Section 9.15(e) Emission of fugitive dust from manufacturing process equipment or control apparatus. Section 9.15(e) Emission of fugitive dust from manufacturing process equipment or control apparatus. Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack. Section 9.16 Failure to operate and maintain equipment in good working order. Failure to meet Order of Approval No. 5732 Condition No. 6(B) Section Failure to meet Order of Approval No. 5732 Condition No. 6(B) Section Failure to meet Order of Approval No. 5732 Condition No. 6(B) Section Failure to meet Order of Approval No. 5732 Condition No. 6(B) CORRECTIVE ACTION ORDER Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:							
-11/20							

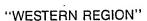
Received By:

Date/Time

Signing this Notice is not an admission of guilt

AGCS2M001005

ASH GROVE CEMENT COMPANY



March 13, 1997

Neal J. Shulman Puget Sound Air Pollution Control Agency 110 Union Street, Suite 500 Seattle WA 98101-2038

Dear Mr. Shulman:

Re: Notice of Violation 36207

It was stated in your letter dated March 3, 1997 that the Agency felt that Ash Grove could have avoided the exceedence by having coal readily available. To clarify our addendum to the December 1996 CEM report, coal was available. The previous day, we had received a barge of whole (unpulverized) coal. After we receive the whole coal, it is pulverized and dried in a bowl mill before it is fired in the kiln. This is where the problem occurred.

This was the first barge received from this source and although we had laboratory data supporting its quality, we were unfamiliar with its physical characteristics. The coal received had a higher moisture than the coal from our usual source making operations of our coal mills difficult. Among other things, the moisture in the coal was causing our rotary feeders to plug, frequently shutting down the mills

The coal firing system is an indirect system. It is dependant on kiln operation to provide an inert source of process gasses for the drying and grinding. Due to these reasons, it is impossible to build an inventory of pulverized fuel without the kiln running (it is impossible for us to grind and create an inventory before starting the kiln). Furthermore if the mills are not able to operate for reasons as mentioned above, it is impossible to maintain the inventory of pulverized fuel we have on hand. To restate our position, it was not that we didn't have coal on hand, but rather unforseen process problems beyond our reasonable control.

Sincerely,

J. Trygve Grey
Process Engineer

110 Union Street, Suite 500, Seattle, Washington 98101-2038

206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No. 1133 9 206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Cert Mail No. > 55 473 3e NOTICE OF VIOLATION

Date of Violatio	n: February	. 19_9		atm.		
Name	/	Responsible Person, Title				
Ash Grove Cement Co.		Gerry Brown Safety Manager				
Location of Violation	(Address)	City	Zip	County		
3801	E. Marginal Way So.	Seattle	98134	King		
Mailing Address		City, State	Zip	Phone J		
٩٥	above			(206) 623-5596		
	DID UNLAWFULLY CAUSE	OR ALLOW VIOL	LATION OF:	5 h		
REGUI	ATION OF THE PUGET SO	OUND AIR POLLUTION	N CONTROL AG	ENCY FOR:		
Section 5.05(e) Section 5.05(e) Section 6.03(a) Section 6.03(a) Section 9.03(a) Section 9.11(a) Section 9.12(b) Section 9.15(a) Section 9.15(b) Section 9.15(c) Section 9.16 S						
of NOx from the main baghouse stack on Feb 21 1996 in excess of the permit condition.						
CORRECTIVE ACTION ORDER Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of his Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the egulations, and take the following necessary corrective action:						
		11				
. 1						

Air follution inspector Form No. 70-119 (Revised 12/95 cbc)

Received By:

Signing this Notice is not an admission of guilt AGCS2M001007